

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

John Douglas Allen

Case No. 1:21-mj-30443

Judge: Morris, Patricia T.

Filed: 09-21-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 15, 2021 in the county of Cheboygan in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1951

Extortion

18 U.S.C. § 844(i)

Attempted Damage or Destruction of Buildings Used in
Interstate Commerce

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: 9/21/2021

City and state: Bay City, MI

*Complainant's signature*

Sean Flood, Special Agent, FBI

Printed name and title*Judge's signature*

Patricia T. Morris

Printed name and title

Save

Print

AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE

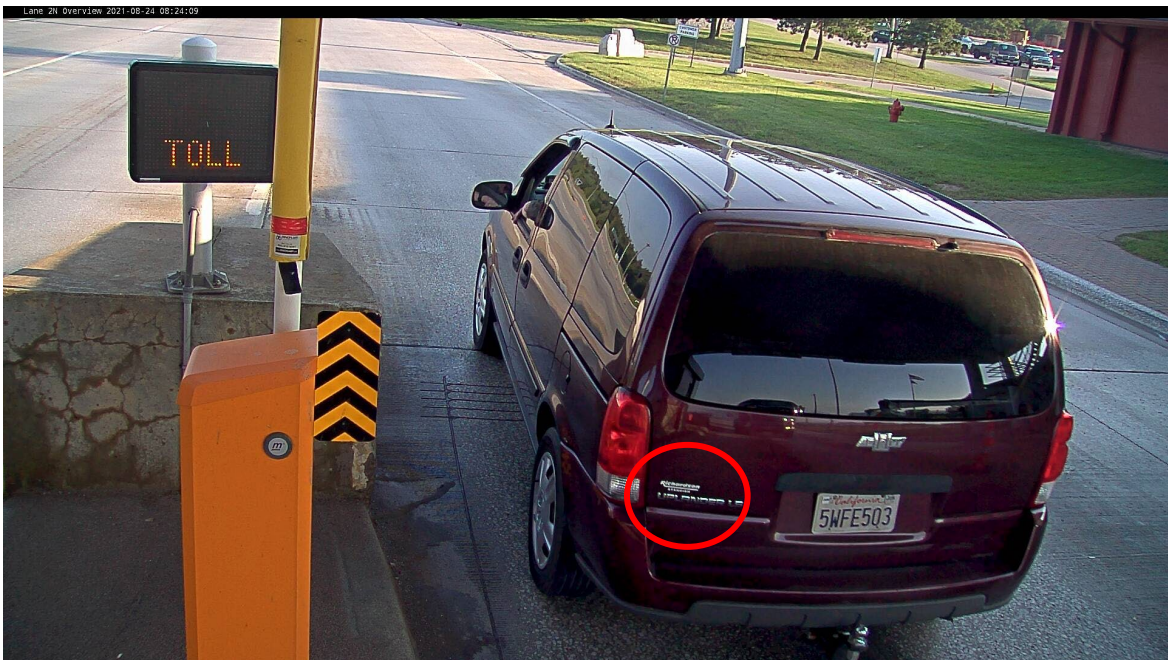
1. I, Sean Flood, a Special Agent with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

2. I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described here, and information gained through my training and experience. The information outlined below is for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.
3. I have been employed as a special agent with the FBI since January 2019. As a Special Agent with the FBI, my duties include the investigation of alleged violations of federal criminal laws, including the subject offenses, 18 U.S.C. § 1951 (Extortion), and 18 U.S.C. § 844(i) (Attempted Damage or Destruction of Buildings Used in Interstate Commerce).
4. I am currently investigating JOHN DOUGLAS ALLEN, d/o/b XX/XX/1946 (ALLEN), for violations of federal criminal laws, including the subject offenses, 18 U.S.C. § 1951 (Extortion), and 18 U.S.C. § 844(i) (Attempted Damage or Destruction of Buildings Used in Interstate Commerce).
5. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that, in the Eastern District of Michigan, Northern Division, and elsewhere, JOHN ALLEN has committed violations of federal criminal law, including 18 U.S.C. § 1951 (Extortion), and 18 U.S.C. § 844(i) (Attempted Damage or Destruction of Buildings Used in Interstate Commerce).

PROBABLE CAUSE

6. On August 24, 2021, at approximately 8:24 am, a maroon-colored vehicle (the VEHICLE) was identified traveling northbound on I-75 North across the Mackinac Bridge, according to video footage from the Mackinac Bridge Authority. As seen in the below image, the VEHICLE had a California license plate, 5WFE503 (California Department of Motor Vehicles did not have records on this license plate, as their records only go back five years). In addition, writing on the rear, driver's side of the vehicle (above the model name, circled in red below) appears to show Richardson Chevrolet Buick, which, based on my research, is an auto dealership located at 501 N Main Street, PO Box 190, Standish, Michigan 48658.



7. On August 25, 2021, a Spectrum employee who was at the telecommunication tower near 90 First Street, St. Ignace, Michigan found a letter on the ground near the fence that surrounds the tower. The letter was inside a polka dot envelope, which was inside a sealed zip lock bag. The letter appeared to have been attached to the fence but fell to the ground before being found. This tower is located just north of US-2 near St. Ignace. The employee opened the letter, which contained a threat and extortion demand to AT&T, Verizon, and other carriers. The employee turned the letter in to the Michigan State Police (MSP) in St. Ignace, Michigan.

8. On August 26, 2021, law enforcement found a second letter at another tower site near W19524 US-2, Gould City, Michigan. This is located on US-2 near the Mackinac/Schoolcraft County line. This letter was also inside a polka dot envelope, inside a sealed zip lock bag, but was found attached to the fence with a black zip tie (circled in red). This letter was photographed and collected as is, and was not opened. Here is a photo of the letter attached to the fence in Mackinac County.



9. On August 26, 2021, the Ontonagon County Sheriff's Office reported that on August 25, 2021, a Volterra Systems cell tower technician found another letter at a tower located near 1199 Giesau Drive, Ontonagon Village, Michigan. The letter was inside the same type of polka dot envelope inside a sealed zip lock bag, which was attached to the fence with a black zip tie. The contents of the letter appeared to be identical to the one located in St. Ignace.
10. On August 26, 2021, law enforcement located a black zip tie on the fence surrounding the cell tower near W7221 Hiawatha Trail, Rexton, Michigan. No letter could be found, but the zip tie appeared similar to the one found in Gould City.
11. The letters each indicate that they are from the "Coalition for Moral Telecommunication (CMT)" and were addressed to "AT&T, Verizon, and all other Carriers." In the letters, CMT claimed to be "almost thirty strong"

and was “prepared to travel throughout this Country and begin distroying [sic] inner city tower communication” unless several demands were followed. One demand was that all “telecommunication containing immoral content must be stopped,” which includes cursing, pornography, and “all manner of indecent communication.” This demand had a time requirement of “six months.” Another demand was payment of \$5 million, which had a time requirement “within 180 days.” The letters also noted that if one of its members were arrested, then “your problems will begin” and the “price will go up one hundred times.” The group claimed in the letter that its “reach” was in 27 states. The letters also had “CMT 5101520TG” at the bottom of them. Images of one of the letters are below.

Coalition for Moral
Telecommunication (CMT)

To AT&T, Verizon, and all other
Carriers:

We are almost thirty strong.
We are prepared to travel throughout
this Country and begin distroying
inner city tower communication
unless the following is followed:

1. All telecommunication containing
immoral content must be stopped.
This includes cursing, the
transmission of pornography, and all
manner of indecent communication.
As software must me developed, you
are therefore given six months to
comply with this demand.

2. Also (within 180 days), you will
be given instructions as to how and
where you will pay us \$5M to cease

and desist.

You may, if you like fight
this, go to the Police, FBI, or any
Government Agency. Understand this:
If **ONE** of our people is arrested,
now or in the future, your problems
will begin. Our reach is in 27
states thus far. After any arrest
the price will go up one hundred
times. Any doubts? Test us!

CMT 5101520TG

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12. On September 15, 2021, at approximately 7:30 pm, a white male, wearing a light-colored hat, a face mask, dark-colored glasses, light-colored shoes, dark-colored pants, a dark-colored shirt, a light-colored vest, and a dark-colored watch (based on the investigation, believed to be JOHN ALLEN) was inside of a sporting goods store located in Sault Ste. Marie, according to video footage. While inside of the sporting goods store, the person consistent in appearance with and believed to be JOHN ALLEN was not wearing gloves. Images from this video footage appear below.



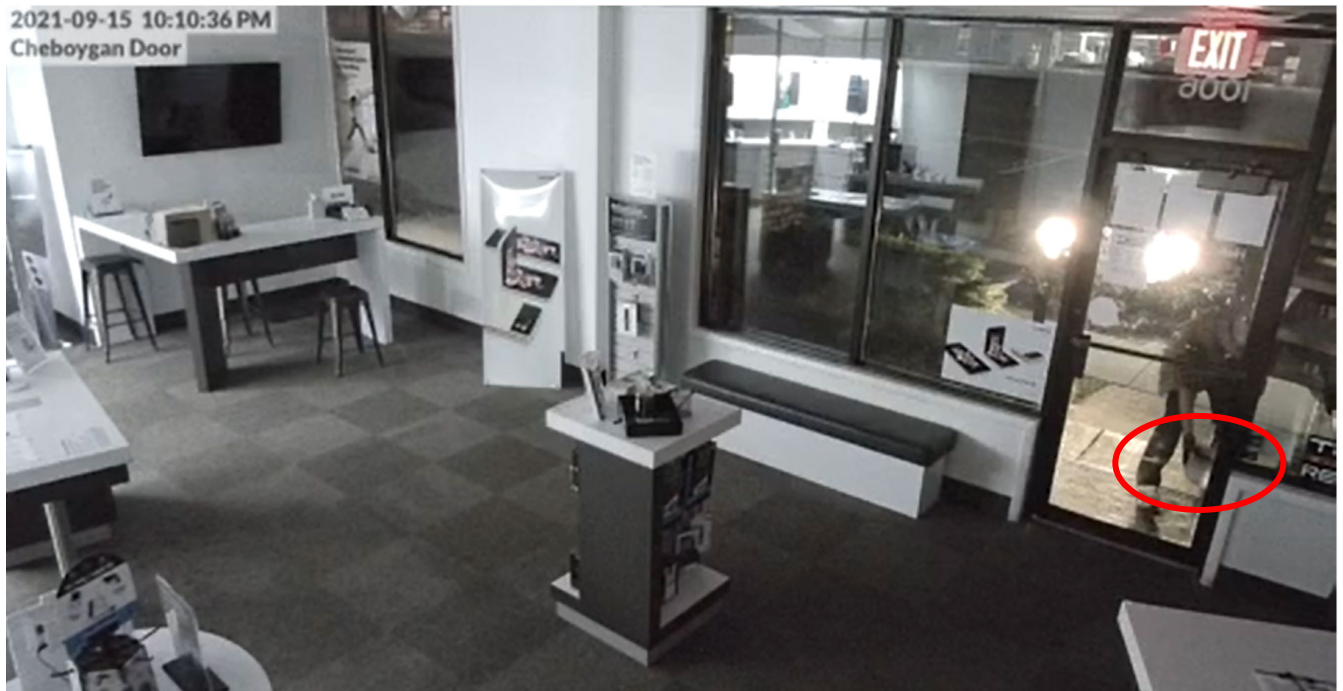


13. On September 15, 2021, at approximately 7:36 pm, the person consistent in appearance with and believed to be JOHN ALLEN placed a box (circled in red) outside of an AT&T Store, located at 2972 W 8th Street, Sault Ste. Marie, Michigan 49783 (the SAULT STE. MARIE BOX), per video footage from a nearby store. The AT&T Store is located in the same shopping complex as the sporting goods store, referenced above. The SAULT STE. MARIE BOX was a United States Postal Service (USPS) box, with black tape on it and a wire coming out of it. The person consistent in appearance with and believed to be JOHN ALLEN was driving a maroon-colored Chevrolet Uplander, with a trailer hitch attached to a gray rear bumper, license plate 5WFE503, with the name of a state containing numerous letters (e.g., California or Washington). However, law enforcement officers were unable to make out the name of the state on this license plate with certainty from this video footage. This vehicle is consistent with and appears to be the VEHICLE in paragraph 6. After discovering the license plate number of this vehicle from this footage, law enforcement officers conducted searches for this license plate number at the Mackinac Bridge Authority, described in paragraph 6. Images of the person consistent in appearance with and believed to be JOHN ALLEN leaving the SAULT STE. MARIE BOX and the VEHICLE appear below. The person consistent in appearance with and believed to be JOHN ALLEN was wearing gloves at the time he left the SAULT STE. MARIE BOX.





14. On September 15, 2021, at approximately 9:37 pm, a maroon-colored van, with a trailer hitch and gray rear bumper, that appeared to be the VEHICLE, traveled southbound across the Mackinac Bridge (about a 50-minute drive from Sault Ste. Marie), per video footage.
15. On September 15, 2021, at approximately 10:10 pm, JOHN ALLEN placed a box (circled in red in the below photograph) outside of the Verizon Store, located at 1006 S Main Street Plaza 27, Suite 3, Cheboygan, Michigan 49721 (the CHEBOYGAN BOX), per video footage from the Verizon Store. The person consistent in appearance with and believed to be JOHN ALLEN appears to have worn gloves at the time he placed the CHEBOYGAN BOX. The CHEBOYGAN BOX was a USPS box, with black tape on it and a wire coming out of it. Video footage from the Verizon Store and other nearby businesses show that the person consistent in appearance with and believed to be JOHN ALLEN traveled to the Verizon Store in a vehicle that matched the general color and description of the VEHICLE. An image of the person consistent in appearance with and believed to be JOHN ALLEN leaving the CHEBOYGAN BOX and an image of the box appear below.



16. On September 16, 2021, at approximately 8:44 am, the Cheboygan Police Department was dispatched to the Verizon Store in Cheboygan, as a Verizon Store employee had discovered a suspicious package. Once the employee realized the package had a wire sticking out of it, the employee called 911. Cheboygan police arrived, and then contacted the MSP Bomb Squad for disposal. This package was also a USPS box with black tape and a wire coming out of it; it looked similar in size and coloring as the CHEBOYGAN BOX left by the person consistent in appearance with and believed to be JOHN ALLEN. I therefore believe that the suspicious package and the CHEBOYGAN BOX left by the person consistent in appearance with and believed to be JOHN ALLEN are the same. Law enforcement analyzed the package and observed it to be consistent with a pipe bomb. Officers also determined the package contained material that, when contained, can detonate when initiated by an outside force such as heat, shock, or friction. The package also contained metal BBs.
17. On September 16, 2021, at approximately 8:50 am, officers from the Sault Ste. Marie Police Department responded to the report of a suspicious package at the AT&T Store in Sault Ste. Marie. In response, the Sault Ste. Marie Police Department requested support from various law enforcement agencies, including the MSP Bomb Squad and the FBI. The suspicious package was a USPS box with black tape and a wire coming out of it; it looked similar in size and coloring as the SAULT STE. MARIE BOX left by the person consistent in appearance with and believed to be JOHN ALLEN. I therefore believe that the suspicious package and the SAULT STE. MARIE BOX left by the person consistent in appearance with and believed to be JOHN ALLEN are the same. The device in the SAULT STE. MARIE BOX contained nails instead of metal BBs but was otherwise similar to the device in the CHEBOYGAN BOX described above. Below is an image of one of the devices.



18. The two devices recovered from the CHEBOYGAN BOX and the SAULT STE. MARIE BOX were examined by the Explosives Unit, FBI Laboratory, which concluded that the two devices were improvised explosive devices (IEDs), also commonly referred to as homemade bombs or pipe bombs. From the FBI Lab's information, and based on my training and experience, I conclude that the two items are destructive devices, commonly referred to as bombs or IEDs. An IED is generally comprised of an explosive main charge, a fuzing system, and a container, all of which were present. Properly assembled and initiated, the potential explosion from these devices could cause property damage, personal injury, and/or death. Each of the devices consisted of a metal pipe nipple with two metal end caps, which provided containment for the low explosive powder main charge. Metal spheres and nails were found within the powders of each device. Hardened objects such as these enhance the explosive effect, propelling fragments of metal outwards at high velocities which can cause additional damage and injuries. Each device contained black granular

material that was preliminarily identified as low explosives. A piece of hobby fuse was inserted through a hole into each of the pipes. In addition, based on the content of the letters found at the cell towers, which contained demands; the language written on the boxes found at the stores, which issued warnings; and the destructive nature of the two devices, as described above, I submit there is probable cause to believe that these actions – placing the letters and destructive devices – constitute threats that would have affected interstate commerce.

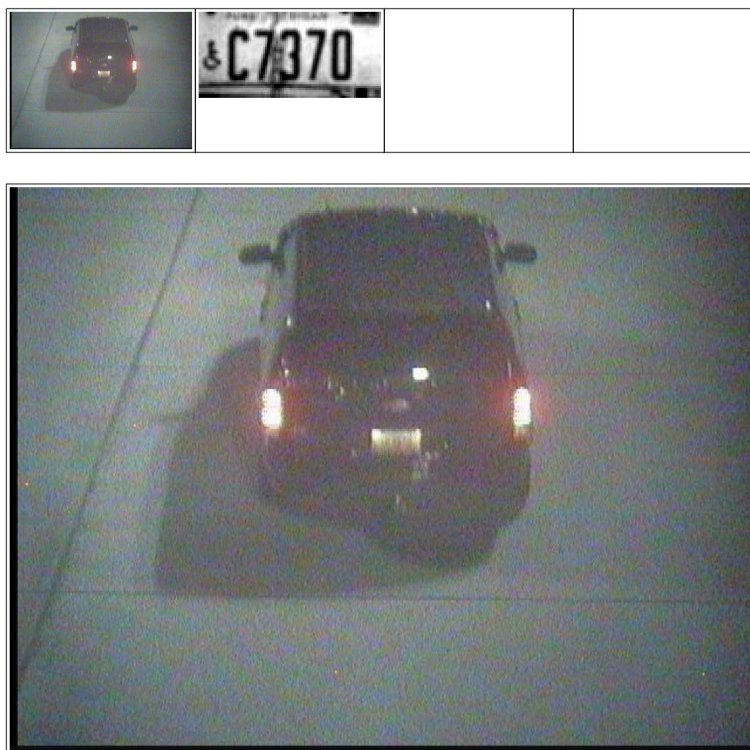
19. Both the SAULT STE. MARIE BOX and the CHEBOYGAN BOX each contained handcuffs. “CMT” was written on both boxes, and “Handcuff Johnny” was written on the CHEBOYGAN BOX, while “HJ” was written on the SAULT STE. MARIE BOX. In addition, both boxes contained language indicating that this was the “last warning,” and that next time, it would be during “business hours” (circled in red in the photograph below).



20. The AT&T Store in Sault Ste. Marie and the Verizon Store in Cheboygan both participate in interstate commerce and engage in activities that affect interstate commerce. Among other things, both stores sell cellular telephones and other electronic devices that are manufactured outside the State of Michigan. Both stores also sell cellular telephone services, which involve interstate communication and interstate commerce. Likewise, the cell towers in the Upper Peninsula at which the letters were placed are instruments of interstate commerce.

21. On September 18, 2021, law enforcement officers went to Richardson Chevrolet Buick in Standish, Michigan. As indicated in paragraph 6, this is the auto dealership whose name appears on the VEHICLE. An employee at the auto dealership provided information on vehicles that had similar characteristics to the VEHICLE that had been sold at the dealership.
22. Law enforcement officers conducted research on these potential vehicles. They eliminated several of these vehicles from further consideration, as their registered owners did not match the description of JOHN ALLEN and/or the vehicles had been junked. One vehicle – a maroon 2006 Chevrolet Uplander, Michigan license plate C7370, with a Vehicle Identification Number (VIN) of 1GNDU23L16D191508 – had a registered owner named JOHN DOUGLAS ALLEN. JOHN ALLEN, who according to his driver's license is six feet tall and 200 pounds, appeared to match the physical description of the person discussed and observed above. The address associated with the vehicle title and registration is 2XX North St, PO Box 271, Whittemore, MI 48770, which matches JOHN ALLEN's residence. The name associated with the vehicle title and registration is JOHN DOUGLAS ALLEN. Additionally, JOHN ALLEN was born in 1946 and is white. JOHN ALLEN's license plate also is a disability license plate. JOHN ALLEN, as depicted in the video footage near the AT&T Store in Sault Ste. Marie as well as in video footage from the Verizon Store in Cheboygan, appears to have a limp.
23. Law enforcement officers conducted searches of license plate number C7370 in a law enforcement database. The database returned positive results for this license plate near the Mackinac Bridge. Specifically, on August 24, 2021, at approximately 11:30 pm, this license plate was identified at the Mackinac Bridge, traveling southbound. The vehicle with this license plate appears to be similar to the VEHICLE (though the image is somewhat dark since it is during nighttime). This is the same date (August 24, 2021) that the VEHICLE was identified traveling northbound across the Mackinac Bridge, with the California license plate 5WFE503. In addition, as noted above, on August 25, 2021, and August 26, 2021, the letters containing threats and demands were discovered at the cell phone

tower sites. An image of the vehicle, taken from the law enforcement database, appears below.



24. The law enforcement database returned another positive result for license plate number C7370. Specifically, on September 15, 2021, at approximately 3:39 pm, this license plate was identified traveling northbound on the Mackinac Bridge. The vehicle with this license plate appears to be similar to the VEHICLE. The vehicle has a trailer hitch and a gray bumper, and is a maroon van, which are characteristics consistent with the VEHICLE. Also, this is the same date (September 15, 2021) that a vehicle that appears to be the VEHICLE was identified traveling southbound across the Mackinac Bridge at approximately 9:37 pm. In addition, as noted above, on this date, the person consistent in appearance with and believed to be JOHN ALLEN placed the boxes with explosives at the two locations (AT&T Store in Sault Ste. Marie and Verizon Store in Cheboygan). Specifically, this travel relates to the crime because it shows the VEHICLE in (and outside of) the Upper Peninsula during the same days/times when the criminal acts described above took place. An image of the vehicle, taken from the law enforcement database, appears below.



25. Overall, video footage at the Mackinac Bridge shows the VEHICLE traveling northbound on the Mackinac Bridge on August 24, 2021, with the California license plate and traveling southbound on August 24, 2021 on the Mackinac Bridge with the Michigan license plate. Additional video footage shows the VEHICLE traveling northbound on the Mackinac Bridge on September 15, 2021 with the Michigan plate and traveling southbound on the Mackinac Bridge on September 15, 2021 with the California plate. I submit there is probable cause to believe that the plates were switched, given the similarities of the vehicles and individuals driving the vehicles. Based on my training and experience, suspected criminals engage in this type of tactic to avoid detection by law enforcement. Specifically, the images below from the Mackinac Bridge Authority appear to show the same VEHICLE, with different license plates. The top image is from September 15, 2021, and the bottom image is from August 24, 2021.



26. In addition, the individual who is driving the VEHICLE with the Michigan license plate appears to have similarities with the individual who is driving the VEHICLE with the California license plate, based on images from the Mackinac Bridge Authority. Specifically, the individual appears to be white and wearing a dark-colored watch on the left wrist. As indicated in the video footage of the person consistent in appearance with and believed to be JOHN ALLEN placing the device at the AT&T Store in Sault Ste. Marie, the person consistent in appearance with and believed to be JOHN ALLEN was wearing a dark-colored watch on his left wrist.
27. On September 18, 2021, I conducted research on JOHN DOUGLAS ALLEN. I observed that JOHN DOUGLAS ALLEN is associated with the address 2XX North Street, Whittemore, Michigan 48770 (2XX North Street), per his Michigan driver's license. In addition, I searched online records from Iosco County, Michigan, which is the county in which 2XX North Street is located. According to these records, the property owners are JOHN ALLEN and a woman who appears to be JOHN ALLEN'S wife.
28. On September 18, 2021, the FBI obtained records regarding JOHN DOUGLAS ALLEN from PayPal. PayPal had records on JOHN DOUGLAS ALLEN and a woman who appears to be JOHN ALLEN's wife. The wife's PayPal account was associated with a particular email address. The FBI conducted open source research on this email address. This email address is tied to a LinkedIn account under the name "John Allen." The description on the account is "Retired underground miner - TG Chenicals [sic] Greater Saginaw – Midland - Bay City area." As noted above, the letters found at the cell tower sites in the Upper Peninsula had "CMT 5101520TG" typed on them (note the "TG" in "TG Chenicals" on the LinkedIn profile matches the "TG" that appears as the last two characters in the content in the letters).
29. The FBI obtained a phone number associated with the PayPal accounts of JOHN ALLEN and a woman who appears to be JOHN ALLEN's wife. Per subscriber records from service provider Ooma, this phone number is linked to a customer named JOHN ALLEN, with an address of 2XX North Street, Whittemore, Michigan 478870.

30. According to a US Postal Service Inspector, JOHN ALLEN maintains PO Box 271 at the post office located at 209 S Bullock Street, Whittemore, MI 48770. This address is located about 0.1 miles from 2XX North Street. The FBI obtained records from Facebook regarding a Facebook account that is linked to an individual named JOHN ALLEN. Additionally, the Facebook records showed that this Facebook account is linked to the same email address appearing in PayPal records regarding accounts associated with JOHN ALLEN and a woman who appears to be JOHN ALLEN's wife. The Facebook records also featured a phone number associated with this account. The FBI obtained information from Verizon regarding this phone number. According to information from Verizon, this was an old phone number linked to JOHN ALLEN, who had an address of PO Box 271, Whittemore, MI.
31. On September 18, 2021, law enforcement officers conducted surveillance at 2XX North Street. They observed a maroon van that appeared to be the VEHICLE, with a license plate ending in 70. As indicated above, the Michigan license plate of the VEHICLE is C7370 and is registered to 2XX North Street (though the vehicle registration includes a PO Box).
32. On September 19, 2021, law enforcement officers conducted surveillance at 2XX North Street. They observed the VEHICLE, with a Michigan license plate C7370, at 2XX North Street.
33. On September 20, 2021, law enforcement officers observed a white male exit 2XX North Street and enter the VEHICLE and drive away. A comparison of the observed white male to JOHN ALLEN's driver's license photograph and information confirmed that the white male who exited the 2XX North Street was JOHN ALLEN.
34. On September 20, 2021, law enforcement officers observed JOHN ALLEN depart the 2XX North Street in the VEHICLE, go to the post office at 209 S Bullock Street, Whittemore, MI 48770, go to a gas station in Whittemore, MI, and eventually go back to 2XX North Street, exit the VEHICLE and enter 2XX North Street.
35. On September 20, 2021, a law enforcement officer who observed JOHN ALLEN at 2XX North Street that day characterized JOHN ALLEN as

having a limp. It should be noted that the person who is consistent in appearance with JOHN ALLEN placing the packages at the AT&T and Verizon Stores appeared to have a limp, based on video footage. Relatedly, on September 20, 2021, a different law enforcement officer who observed JOHN ALLEN's travels on September 20, 2021, described above, reviewed video footage of the person who is consistent in appearance with JOHN ALLEN placing the CHEBOYGAN BOX. According to that law enforcement officer, JOHN ALLEN and the person who is consistent in appearance with JOHN ALLEN placing the CHEBOYGAN BOX had the same gait. Specifically, JOHN ALLEN and that person raised their right leg in the exact same manner.

36. According to records from the Michigan Department of State, JOHN ALLEN applied in April 2014 for a disability parking placard. On the application, the applicant was identified as "JOHN D. ALLEN," with an address of 2XX North Street, PO Box 271, Whittemore, MI 48770. The application contained a signature of "JOHN D. ALLEN."
37. On September 20, 2021, law enforcement executed a federal search warrant at 2XX North Street, and interviewed JOHN ALLEN's wife, and she reviewed images from the videos referred to above and stated that she was "95%" sure that the person consistent in appearance with and believed to be JOHN ALLEN was in fact JOHN ALLEN, and that JOHN ALLEN had recently made a trip to the Upper Peninsula. JOHN ALLEN's wife also stated that agents would find polka dot envelopes consistent with those pictured and discussed above at 2XX North Street.
38. On September 20, 2021, law enforcement interviewed JOHN ALLEN. After receiving his *Miranda* rights notification (i.e., Advice of Rights), JOHN ALLEN voluntarily agreed to speak with the Agents. He verbally agreed to waive his rights. He also signed a document waiving his rights. Agents then interviewed JOHN ALLEN.
39. During the interview, JOHN ALLEN advised agents of the following, among other things. He created about three or four letters, signed from the Coalition for Telecommunication (CMT), and left them at cell towers in the Upper Peninsula. He specifically recalled leaving a letter at the tower near road US-2 and the tower in Ontonagon. All of the zip ties he used were pre-looped. JOHN ALLEN confirmed he switched the plates on his vehicle to avoid detection by law enforcement. Additionally, he tried to

disguise his vehicle further by removing the hitch attached to it. However, JOHN ALLEN stated that he realized that he had made a mistake when he noticed the emblem for the auto dealership on the rear of the vehicle could not be removed. JOHN ALLEN bought the components of the bombs about one year ago at various hardware stores. He used cash to buy these components to avoid detection by law enforcement. For the past year, the bombs were in a box at his property. He waited a year to build up the courage to place them. JOHN ALLEN obtained the California license plate referenced above at a flea market in Bay City, Michigan. JOHN ALLEN noted he sent additional letters, addressed to AT&T and Verizon, to AT&T headquarters. These letters were similar to the letters he left at the cell towers in the Upper Peninsula. However, these mailed letters included instructions on how to pay JOHN ALLEN.

40. JOHN ALLEN also advised he placed the packages at the AT&T Store in Sault Ste. Marie and the Verizon Store in Cheboygan. He described what he wrote on the boxes, including the reference to "Handcuff Johnny" and the threat that next time, it would happen during business hours. "Handcuff Johnny" referred to JOHN ALLEN's belief that he (i.e., "Johnny") would end up in handcuffs as a result of his actions. JOHN ALLEN indicated that he placed handcuffs in the packages. He also described the green fuse sticking out of them. He did not remember which package went to which cell phone store. After leaving the first package at the AT&T Store in Sault Ste. Marie, JOHN ALLEN stated that he got scared because he thought someone had seen him. But he continued to travel to Cheboygan to leave the second package. JOHN ALLEN stated that he created and placed the letters and bombs because he became dissatisfied with all of the immoral content, including pornography, on phones and cable television. JOHN ALLEN advised that he acted alone, and that there is no CMT group composed of multiple individuals. He stated that he only made the two bombs described above.
41. Agents showed JOHN ALLEN photographs of the person consistent in appearance with and believed to be JOHN ALLEN discussed above. JOHN ALLEN confirmed he was the individual depicted in these photos. JOHN ALLEN advised that within the last few days, as of September 20, 2021, he noticed vehicles he believed were following him. JOHN ALLEN said that, as a result, he decided to throw away items, such as the California license plate, in an area away from his residence.

CONCLUSION

42. Based on the aforementioned information, I respectfully submit there is probable cause to believe that, in the Eastern District of Michigan, Northern Division, and elsewhere, JOHN DOUGLAS ALLEN, d/o/b XX/XX/1946, did violate Title 18 U.S.C. § 1951 (Extortion), and Title 18 U.S.C. § 844(i) (Attempted Damage or Destruction of Buildings Used in Interstate Commerce).
43. Based on the foregoing, I request the Court issue the proposed complaint.

Respectfully submitted,



Sean Flood
Special Agent
FBI

Subscribed and sworn to before me in my presence and/or by reliable electronic means on September 21, 2021



Honorable Patricia T. Morris
UNITED STATES MAGISTRATE JUDGE